previous discussions of distinguishing characteristics of this
subject matter. Although the Final Rejection proposes that
DiGiorgio discloses APDUs that are communicated between a PSD and
a client terminal, these received [identical] APDUs are not
communicated between the client and a remote computer system
(i.e., server) in an unaltered form. In other words, DiGiorgio's
client terminal creates messages, which do not identically
include the received APDUs, to send to the remote computer system
based on the APDUs received from the PSD, whereas the claimed
invention inserts the identical APDUs received from the PSD into
messages sent to the remote computer system. Similarly,
DiGiorgio's client terminal creates APDUs to send to the PSD
based on a message, which does not identically include the
created APDUs, received from the remote computer system, whereas
the invention defined by claim 1 strips APDUs from messages
received from a remote computer system to send [identically] to
the PSD.

Thus, DiGiorgio does not disclose the claimed features
whereby: (1) a client routes APDUs received from a remote
computer system to a PSD and (2) routes APDUs received from a PSD
to a remote computer system.

The Advisory Action proposes: (1) that Applicants argued in
their Response, dated December 19, 2006, that DiGiorgio does not

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disclose a communication section that communicates message packets over a network using a packet based communication protocol and (2) how DiGiorgio does disclose such a feature (see Advisory Action page 2, lines 1-8). Applicants did not argue anything similar to what the Advisory Action proposes. Instead, Applicants argued the following points.

DiGiorgio fails to disclose the features recited in claim 1 of: (1) separating encapsulated APDUs from message packets that are received from a remote computer system and communicating the separated APDUs to a PSD and (2) encapsulating APDUs received from a PSD interface into message packets that are communicated to the remote computer system.

The Final Rejection proposes that DiGiorgio's disclosure of "[w]hen a user attempts to access ISP services from the token device, the ISP issues a challenge to the token device to ensure that the user should be granted access to the ISP services" is identical to claimed feature (1), above (see Final Rejection section 6, lines 8-15). Simply stated, the Final Rejection proposes that issuing a challenge from an ISP to a token device is identical to the claimed feature of separating encapsulated APDUs from message packets that are received from a remote computer system and communicating the separated APDUs to a PSD.

However, the proposed disclosure of issuing a challenge from an ISP to a token device does not expressly describe or inherently require that:

(A) the challenge issued by the ISP be in the form of APDUs that are encapsulated in message packets;

(B) a client terminal interfacing the token device to the ISP separates the APDUs from the message packets received from the ISP; or

(C) the client terminal communicates the separated APDUs (i.e., the identical APDUs encapsulated by the ISP into message packets) to the token device. Thus, DiGiorgio fails to disclose the claimed feature of separating encapsulated APDUs from message packets that are received from a remote computer system and communicating the separated APDUs to a PSD.

With regard to claimed feature (2), above, the Final Rejection proposes that DiGiorgio's disclosure of "[o]nce the challenge is received at the token device, the token device issues a response to the ISP challenge in the form shown in Figure 8B" is identical to claimed feature (2) (see Final Rejection page 4, lines 1-6). Simply put, the Final Rejection proposes that issuing a response from the token device in the form of APDUs is identical to encapsulating APDUs received from a

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PSD interface into message packets that are communicated to a remote computer system.

However, the proposed disclosure of issuing a response in the form of APDUs from a token device to an ISP only requires that the token device issues APDUs. This proposed disclosure does not expressly describe or inherently require that:

(D) an intermediary client terminal interfacing the token device and ISP encapsulates the APDUs received from the token device (i.e., the identical APDUs communicated by the token device) into message packets; or

(E) the client terminal communicates the encapsulated APDUs to the ISP. Thus, DiGiorgio fails to disclose the claimed feature of encapsulating APDUs received from a PSD interface into message packets that are communicated to a remote computer system.
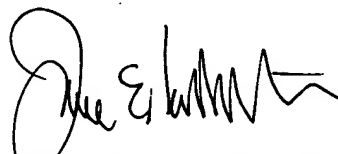
Accordingly, Applicants submit that DiGiorgio does not anticipate the subject matter defined by claim 1. Independent claims 20, 29, and 42 similarly recite the above-described features distinguishing apparatus claim 1 from DiGiorgio, but with respect to methods. Therefore, the obviousness rejections applied to claims 18 and 40 are obviated and allowance of claims 1, 20, 29, and 42 and all claims dependent therefrom is warranted.

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Applicants will address the double patenting rejection when its provisional status is removed.

In view of the above, it is submitted that this application is in condition for allowance and a notice to that effect is respectfully solicited.

If any issues remain which may best be resolved through a telephone communication, the Examiner is requested to telephone the undersigned at the local Washington, D.C. telephone number listed below.

Respectfully submitted,

Date: March 19, 2007
JEL/DWW/att

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